

March 29th, 2015

Received & Inspected

**Request for Review
Appeal Denial of Funding
Christopher Columbus High School**

APR - 6 2015

FCC Mail Room

CC Docket No. 02-6
CC Docket No. 96-45

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Appellant Name:	Richard Senturia, consultant for applicant.
Applicant:	Christopher Columbus High School
Applicant BEN Number:	36907
Application Form 471 Number:	897750
FRN:	2439659

To whom it may concern,

This is an appeal of USAC's Administrator's Decision on Appeal for Application Form 471 Number 897750, FRN 2439659, Miami-Dade Broadband Coalition (SPIN current 143040866 / deactivated 14034811) dated January 29th, 2015.

USAC has denied the appeal for an Invoice Deadline Extension filed on October 29th, 2014, in effect denying commitment of and dispersal of funds for FRN 2439659 in the amount of \$8,491.63 because it claims that the FRN has been paid in full.

We seek review of the Administrator's Decision on Appeal that in turn, will enable Christopher Columbus High School to be reimbursed the full amount of \$8,491.63 for which they were awarded by USAC on June 6th, 2013.

While there was in fact a funding commitment and a subsequent attempt to disperse funds for FRN 2439659 in the amount of \$8,491.63, to date no monies have been paid out. The process of disbursing funds was initiated but never completed due to the following factors as outlined in the time sequence below.

On September 23rd, 2014 our office filed a Billed Entity Application Form (BEAR) indicating 143034811 as the SPIN in Block 4, Item 3. This application, due to our ministerial error, included the *deactivated* SPIN 143034811, which was approved by Miami-Dade on September 29th, 2014 and subsequently mailed to USAC on September 30th, 2014.

No. of Copies rec'd
List ABCDE

0

Please see attached documentation: Document 1

FY13_BEAR Approval_MiamiDade_9.29.14_Christopher Columbus HS_36907

On October 16th, 2014 we received Form 472 (BEAR) Notification Letter which included a Funding Commitment Decision in the amount of \$8491.63 for FRN 2439659.

Please see attached documentation: Document 2

FY13_USAC_472 BEAR Notification_MiamiDade_10.16.14_Christopher Columbus HS_36907

On October 23rd, Mr. James Osteen, Jr. of Miami-Dade received an email from USAC stating,

USAC has initiated an electronic payment to (*deactivated*) 143034811 for a Schools & Libraries Billed Entity Applicant Reimbursement (BEAR) payment. A payment in the amount of **\$8,491.63** has been electronically transmitted for deposit into the bank account you have designated on the FCC Form 498. The effective date of this payment is **10/24/2014.**

The USAC transaction id is **1140853885.**

Please see attached documentation: Document 3, pg. 4

FY13_USAC Email-Electronic Transfer_2pg_MiamiDade_10.23.14_Christopher Columbus HS_36907

On October 29th, 2014 On October 23rd, Mr. James Osteen, Jr. of Miami-Dade received a second email from USAC stating,

An ACH payment issued to your company by USAC for SLC program support has been rejected by the bank we have on file for your SPIN. You must update your FCC Form 498 to resolve this matter and receive payment.

While this issue is currently impacting your ability to receive support from the SLC program, it is possible that we also have outdated information for other programs in which you participate, which may prevent other disbursements from being paid to your company until you update your FCC Form 498.

Please see attached documentation: Document 3, pg. 2

FY13_USAC Email-Electronic Transfer_2pg_MiamiDade_10.23.14_Christopher Columbus HS_36907

On December 29th a letter of appeal was made requesting an Invoice Deadline Extension and a SPIN change approval, which were denied because USAC claims the FRN was paid in full

In summary,

Miami Dade's deactivated SPIN 143034811 has Christopher Columbus High School's account linked to it. The school has been denied applying for a SPIN change or Invoice Deadline Extension to rectify the situation. The money is tied up at USAC, our documentation illustrates demonstratively that the money USAC attempted to pay out to the deactivated SPIN was in fact rejected.

Please grant Christopher Columbus High School an Invoice Deadline Extension and approval of SPIN change, or the means to do so one so that Christopher Columbus High School can be reimbursed the funds that are rightfully theirs; funds in the amount of \$8,491.63, which they were awarded by USAC on June 6th, 2013.

Respectfully,

Candice V. Lewis, for Richard Senturia, Consultant
9666 Olive Street Blvd, Suite 215
(314) 282-3676
rsenturia@erateprogram.com

FCC Form 472
DO NOT STAPLE THIS FORM

Do not write in this space

mailed 9/30/14

Universal Service for Schools and Libraries

Please read instructions before completing.

(To be completed by schools, libraries, or consortia.)

BILLED ENTITY APPLICANT REIMBURSEMENT FORM

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Only one Service Provider Identification Number (SPIN) per form.

Must be completed and signed by the Billed Entity Applicant and signed by the relevant service provider.

Persons willfully making false statements on this form can be punished by fine or forfeiture, under the Communications Act, 47 U.S.C. Secs. 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. Sec. 1001.

FCC NOTICE FOR INDIVIDUALS REQUIRED BY THE PRIVACY ACT AND THE PAPERWORK REDUCTION ACT

Part 54 of the Commission's Rules authorizes the FCC to collect the information on this form. Failure to provide all requested information will delay the processing of the application or result in the application being returned without action. Information requested by this form will be available for public inspection. Your response is required to obtain the requested authorization.

The public reporting for this collection of information is estimated to range from 1 to 2 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the required data, and completing and reviewing the collection of information. If you have any comments on this burden estimate, or how we can improve the collection and reduce the burden it causes you, please write to the Federal Communications Commission, AMD-PER, Paperwork Reduction Act Project (3060-0856), Washington, DC 20554. We will also accept your comments regarding the Paperwork Reduction Act aspects of this collection via the Internet if you send them to PRA@fcc.gov. PLEASE DO NOT SEND YOUR RESPONSE TO THIS FORM TO THIS ADDRESS.

Remember – You are not required to respond to a collection of information sponsored by the Federal government, and the government may not conduct or sponsor this collection, unless it displays a currently valid OMB control number or if we fail to provide you with this notice. This collection has been assigned an OMB control number of 3060-0856.

THE FOREGOING NOTICE IS REQUIRED BY THE PRIVACY ACT OF 1974, PUBLIC LAW 93-579, DECEMBER 31, 1974, 5 U.S.C. 552a(e)(3) AND THE PAPERWORK REDUCTION ACT OF 1995, PUBLIC LAW 104-13, OCTOBER 1, 1995, 44 U.S.C. SECTION 3507.

Applicant Form Identifier (Create an identifier for your own reference)
2439659

FCC Form 472 Invoice #
(To be inserted by administrator)

BLOCK 1: HEADER INFORMATION

1. Billed Entity Name	Christopher Columbus High	+
2. Billed Entity Number	36907	
3. Service Provider Identification Number (SPIN)	143034811	
4. Contact Name	Richard Senturia	
5. Contact Telephone Number	314-282-3676	
6. Total Reimbursement Amount (total from Block 2, Column 14)	\$18,160.00	

Billed Entity Applicant Reimbursement Form

For reimbursement of discounts on approved services already paid for by the Billed Entity Applicant.

Billed Entity Name Christopher Columbus High

Billed Entity Number 36907

Contact Name Richard Senturia

Contact Telephone Number 314-282-3676

Applicant Form Identifier 2439659

BLOCK 2: LINE ITEM INFORMATION PER FUNDING REQUEST NUMBER

	(7) FCC Form 471 Application Number (from Funding Commitment Decision Letter)	(8) Funding Request Number (FRN) (from Funding Commitment Decision Letter)	(9) Bill Frequency	(10) Customer Billed Date (mm/yyyy)	(11) Shipping Date to Customer or Last Day of Work Performed (mm/dd/yyyy)	(12) Total (Undiscounted) Amount for Service	(13) Discount Rate	(14) Amount Billed to USAC (Column 12 multiplied by Column 13)
			DO NOT WRITE IN THIS COLUMN.	For each FRN, complete either Column (10) or Column (11), but not both Columns				
1	897750	2439659		07/2013		\$1,700.00	0.40	\$680.00
2	897750	2439659		08/2013		\$1,700.00	0.40	\$680.00
3	897750	2439659		09/2013		\$4,200.00	0.40	\$1,680.00
4	897750	2439659		10/2013		\$4,200.00	0.40	\$1,680.00
5	897750	2439659		11/2013		\$4,200.00	0.40	\$1,680.00
6	897750	2439659		12/2013		\$4,200.00	0.40	\$1,680.00
7	897750	2439659		01/2014		\$4,200.00	0.40	\$1,680.00
8	897750	2439659		02/2014		\$4,200.00	0.40	\$1,680.00
9	897750	2439659		03/2014		\$4,200.00	0.40	\$1,680.00
10	897750	2439659		04/2014		\$4,200.00	0.40	\$1,680.00
11	897750	2439659		05/2014		\$4,200.00	0.40	\$1,680.00
12	897750	2439659		06/2014		\$4,200.00	\$0.40	\$1,680.00
13								\$0.00
14								\$0.00
TOTAL REIMBURSEMENT AMOUNT TO BE ENTERED INTO ITEM (6)							\$18,160.00	

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name Christopher Columbus High

Billed Entity Number 36907

Contact Name Richard Senturia

Applicant Form Identifier 2439659

Block 3: Billed Entity Certification

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Billed Entity Applicant Reimbursement Form on behalf of the eligible schools, libraries, or consortia of those entities represented on this Form, and I certify to the best of my knowledge, information and belief, as follows:

- A. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form represent charges for eligible services delivered to and used by eligible schools, libraries, or consortia of those entities for educational purposes, on or after the service start date reported on the associated FCC Form 486.
- B. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form were already billed by the service provider and paid by the Billed Entity Applicant on behalf of eligible schools, libraries, and consortia of those entities.
- C. The discount amounts listed in Column (14) of this Billed Entity Applicant Reimbursement Form are for eligible services approved by the fund administrator pursuant to a Funding Commitment Decision Letter.
- D. I recognize that I may be audited pursuant to this application and will retain for at least five years (or whatever retention period is required by the rules in effect at the time of this certification), after the last day of service delivered in this funding year any and all records that I rely upon to fill in this form.
- E. I certify that, in addition to the foregoing, this Billed Entity Applicant is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

15. Signature of authorized person

Richard Senturia

16. Date

09/23/2014

17. Printed name of authorized person

Richard Senturia

18. Title or position of authorized person

Consultant

19. Telephone number of authorized person

314-282-3676

20. Address of authorized person

9666 Olive Blvd.
Suite 215
Olivette, MO 63132

BILLED ENTITY APPLICANT Reimbursement Form

Billed Entity Name Christopher Columbus High

Billed Entity Number 36907

Contact Name Richard Senturia

Applicant Form Identifier 2439659

Block 4: Service Provider Acknowledgment

I declare under penalty of perjury that the foregoing is true and correct and that I am authorized to submit this Service Provider Acknowledgment for this Billed Entity Applicant Reimbursement Form, and acknowledge to the best of my knowledge, information and belief, as follows:

- A. The service provider must remit the discount amount authorized by the fund administrator to the Billed Entity Applicant who prepared and submitted this Billed Entity Applicant Reimbursement Form as soon as possible after the fund administrator's notification to the service provider of the amount of the approved discounts on this Billed Entity Applicant Reimbursement Form, but in no event later than 20 business days after receipt of the reimbursement payment from the fund administrator, subject to the restriction set forth in B. below.
- B. The service provider must remit payment of the approved discount amount to the Billed Entity Applicant prior to tendering or making use of the payment issued by the Universal Service Administrative Company to the service provider of the approved discounts for the Billed Entity Applicant Reimbursement Form.
- C. I certify that, in addition to the foregoing, this Service Provider is in compliance with the rules and orders governing the schools and libraries universal service support program, and I acknowledge that failure to be in compliance and remain in compliance with those rules and orders may result in the denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with the rules and orders governing the schools and libraries universal service support program could result in civil or criminal prosecution by law enforcement authorities.

21. Signature of authorized person (fax, copy or original signature)

22. Date

23. Printed name of authorized person

24. Title or position of authorized person

25. Telephone number of authorized person

26. Address of authorized person

27. Applicant Remittance Information

Name Dwight Pearce
Title Principal

Street Address 3000 SW 87 Avenue
Miami, FL 33165



Universal Service Administrative Company

Schools and Libraries Division

Form 472 (BEAR) Notification Letter

October 16, 2014

James Osteen
Miami-Dade Broadband Coalition, Inc
100 South Biscayne Blvd., Suite 915
Miami, FL 33131

Re: Invoice Number - as assigned by USAC: 2081469
Service Provider Identification Number: 143034811
Reimbursement Form Number: 2439659
Billed Entity Number: 36907

Richard Senturia
CHRISTOPHER COLUMBUS HIGH SCH
9666 Olive Street Blvd.
Olivette, MO 63132

Preferred Mode of Contact: E-mail at rsenturia@erateprogram.com
Total Amount of Reimbursement Approved for Payment: \$8491.63

This letter is your notification that the Schools and Libraries Division (SLD) of the Universal Service Administrative Company (USAC) has processed an FCC Form 472, "Billed Entity Applicant Reimbursement (BEAR)" Form from the above named applicant listing you as the service provider. USAC has committed to reimburse the discounted portion of the cost of eligible services provided to eligible entities pursuant to one or more FCC Forms 471, "Description of Services Ordered and Certification Form".

In certain instances, a line may not have been paid. Review the BEAR Letter Applicant Reimbursement Report (Report) following this letter for the reason(s) this may have occurred. For more information about lines that have not been paid, see the explanation of Invoice Error Codes in Step 9 on our website. Work with the applicant (your customer) to correct any errors. Once corrected, your customer may submit a new BEAR to request reimbursement for any unpaid lines.

We recommend using the BEAR Online tool from the Apply Online area or Required Forms section of our website for additional submissions. If a new BEAR cannot be submitted before the invoice deadline passes, you or your customer may submit a request for a deadline extension. (See "Invoice Deadlines and Extension Requests" posted in the SLD section of our website for more information.)

Pursuant to the Federal Communication Commission's (FCC) Second Report and Order and Further Notice of Proposed Rulemaking (FCC 03-101, released April 29, 2003), you must remit the amount shown as "Total Amount of Reimbursement Approved for Payment" above to your customer no later than 20 days after receipt of payment of the approved discounts from USAC. You also agreed not to tender or make use of the payment of the approved discounts issued by USAC to you prior to remitting the discount to your customer (See BEAR Form, Block 4, Service Provider Acknowledgment).

The USAC check should be mailed to the service provider named above within 20 days of the date of this letter..

Schools and Libraries Division - Correspondence Unit
30 Lanidex Plaza West, PO Box 685, Parsippany, NJ 07054-0685
Visit us online at: www.usac.org/sl

The maximum remaining amount available for each Funding Request Number (FRN) listed on the Report will be the original commitment less the amount approved herein for reimbursement and less any earlier disbursements to your customer.

PLEASE NOTE: The type of invoice form (BEAR or SPI) for the funding year is established by the receipt and approval of the first invoice submitted for the FRN for the funding year. For example, if we successfully process a BEAR for an FRN, we will not approve a SPI for that same FRN at a later time.

Please see the Guide to Letter Reports posted on our website for an explanation of the items listed in the attached Report.

COMPLETE PROGRAM INFORMATION is posted on our website. You may also contact our Client Service Bureau using the "Submit a Question" link on our website, toll-free by fax at 1-888-276-8736 or toll-free by phone at 1-888-203-8100.

Schools and Libraries Division
Universal Service Administrative Company

CC: CHRISTOPHER COLUMBUS HIGH SCH

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$680.00

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$680.00

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$1680.00

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$1680.00

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$1680.00

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$1680.00

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$411.63
Reimbursement Request Decision Explanation:
Partial Paymnt, Inv > Remaining Commitment;

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
No Payment, Total Commitment Paid;

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
No Payment, Total Commitment Paid;

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
No Payment, Total Commitment Paid;

BEAR NOTIFICATION LETTER APPLICANT REIMBURSEMENT REPORT

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
No Payment, Total Commitment Paid;

Form 471 Application Number: 897750
Funding Request Number: 2439659
Funding Year 2013: 07/01/2013 - 06/30/2014
Contract Number: MTM
Funding Commitment Decision: \$8491.63
Reimbursement Amount for this FRN: \$0.00
Reimbursement Request Decision Explanation:
No Payment, Total Commitment Paid;

Candice Lewis

From: Cricky Cirillo
Sent: Wednesday, March 25, 2015 12:03 PM
To: Candice Lewis
Subject: FW: Notice: Payment Rejection-Request For Updated SPIN Banking Information

From: James Osteen Jr [mailto:jeosteen@sfdigitalalliance.org]
Sent: Wednesday, March 25, 2015 12:01 PM
To: Cricky Cirillo
Cc: Joseph Seroussi
Subject: FW: Notice: Payment Rejection-Request For Updated SPIN Banking Information

Cricky,
Below is the "Bounce" notification from USAC per your request.

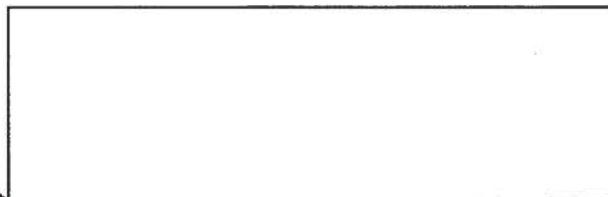
*Thank you,
James E. Osteen, Jr.
Executive Director, South Florida Digital Alliance/Miami-Dade Broadband Coalition*

100 South Biscayne Boulevard, Suite 915
Miami, FL 33131
Office: (305) 371-0340 x 2
Fax: (305) 371-0341
Cell: (305) 586-7050
E-mail: jeosteen@sfdigitalalliance.org
Web: <http://www.sfdigitalalliance.org>

SFDA - Connecting our community for a brighter future



From: CustomerSupport@usac.org [mailto:CustomerSupport@usac.org]
Sent: Wednesday, October 29, 2014 10:50 AM
To: James Osteen; James Osteen
Cc: customersupport@usac.org
Subject: Notice: Payment Rejection-Request For Updated SPIN Banking Information



Information Required to Send Your Payment

SPIN: 143034811

Company Name: Miami-Dade Broadband Coalition, Inc

Dear Service Provider :

An ACH payment issued to your company by USAC for SLC program support has been rejected by the bank we have on file for your SPIN. You must update your FCC Form 498 to resolve this matter and receive payment.

While this issue is currently impacting your ability to receive support from the SLC program, it is possible that we also have outdated information for other programs in which you participate, which may prevent other disbursements from being paid to your company until you update your FCC Form 498.

You can find the information for submitting your revised FCC Form 498 here:

Filing and Managing my 498

If you need additional assistance please contact our Customer Operations Center at (888) 641- 8722, or via email at CustomerSupport@usac.org. We are available Monday through Friday from 9:30 AM until 4:30 PM ET. Please reference Case Number 2014ACHR1095 when contacting us.

This is a time sensitive matter, and your prompt reply is needed.

Regards,

**USAC Customer Operations
<http://www.usac.org> |(888) 641-8722**

Candice Lewis

From: Cricky Cirillo
Sent: Wednesday, March 25, 2015 11:46 AM
To: James Osteen Jr
Cc: Candice Lewis
Subject: FW: 143034811- Schools & Libraries BEAR payment notification

Categories: Yellow Category

Hello Jim,

This is the only string I have regarding Christopher Columbus. I don't show an email from USAC stating the money bounced back. If you can locate it please send to me and I will get it to Candice. The only thing USAC is showing is the money was approved and deposited.

Thank you

Cricky Cirillo

eRateProgram, LLC
A Private Consulting Company

cricky@erateprogram.com
www.eRateProgram.com

phone: (314) 282-3676
direct line: (314) 282-3675
fax: (314) 665-3606
9666 Olive Blvd, Ste 215
St. Louis, MO 63132

From: James Osteen Jr [<mailto:jeosteen@sfdigitalalliance.org>]
Sent: Wednesday, October 29, 2014 10:33 AM
To: John Danley; Cricky Cirillo; Terra Bradley
Subject: FW: 143034811- Schools & Libraries BEAR payment notification

All,

Despite our request to change the USAC filing number (to 143040866 FRN 0021730569 EIN 45-2476535) it seems that the payment below was issued against the old account number (143034811 FRN 0020177150 EIN 27-0407368). Additionally the electronic payment listed below has not shown up in either of our bank accounts. Just spoke with GUY at 888-641-8722....he stated that the payment is being delayed because incorrect banking information for the old account. He also said that a 498 had not been filed since 2010 and that this needed to be updated....with the bank number and an associated FRN. I believe that our CPA deactivated the FRN number associated with the old account, and we have only been filing reports against the new USAC filing number and new FRN number.

If USAC had indeed processed the payment against the new USAC filing number 143040866....this would not be an issue since all information associated with that account is current.

I could really use your assistance in getting this straightened out and resolved. Can we schedule time this afternoon to address?

Thank you,